

system, with each such channel comparable in character and effect to a traditional radio entrant, would surely drive traditional radio to bankruptcy.

The prediction is heroic. SDARS services are purchased as a bundle, and the listener would consider whether the SDARS bundle offers an advantage over the bundle of traditional radio services now available that would justify the price charged. Surely a great many traditional radio listeners will avoid the purchase. I know of no other prediction that audience diversion to SDARS would be so great as to cause the demise of traditional radio. In fact, there is no reason to suppose the diversion of 3 percent of traditional radio listeners to SDARS, or even 10 percent, would cause substantial numbers of traditional radio stations to discontinue operating. My analysis of viable station sizes presented above does not support the demise of traditional radio, nor does NAB's consumer survey. With a 10 percent audience diversion to SDARS, which could be much too high, virtually all stations that lose this percentage of their audience continue to reach audiences that are larger than the unadjusted audiences of stations in other markets of roughly similar size.

VIII. Fratik; Miller, Kaplan, Arase & Co.

Dr. Fratrik presents statistics indicating that net revenues of traditional stations fell on average from 1987-1991 and that 1991 was a bad year in that at least one-half of all stations reported accounting losses. NAB presents this data to suggest that traditional radio is in precarious condition, so that any audience diversion to SDARS could reduce substantially the number of stations. However, absent a significant decrease in the demand for radio advertising (and no evidence of this is given), I would not expect the entry of SDARS (even with a 10 percent audience diversion which likely is much too large) to cause any significant "return" of licenses, which is the main issue. Significant failure has not been shown by NAB. In fact, with the potential entry of SDARS clearly known, over 1000 stations have entered between 1990 and 1994. Also, in 1993, stations were selling at historically high multiples of cash-flows, which is not a sign of expected unprofitability. The negative accounting

profits in 1991 also did not result in licenses being "returned". Finally, the figures on profitability or net revenue declines are not shown clearly by NAB to relate to a decline in local programming. The Miller-Kaplan pro-forma shows station losses if audiences decline by 10 percent. These results would appear to be subject to the same criticisms as the above. However, it is difficult to comment on the Miller-Kaplan study because the underlying data and assumptions are not presented.

IX. Benefits of SDARS

NAB argues that the benefits of SDARS are

"either nonexistent, unrealistic or of minimal value in terms of people benefitted or of added choice. When compared to the expected costs in terms of diminution of local radio service, whatever value unrestricted DARS will in fact offer cannot be worth the risk."

The argument that SDARS will offer little benefit is based on the view that the number of traditional radio stations and program formats currently available leave little room for SDARS to add to consumer choice or program diversity. However, bear in mind that if successful, SDARS will provide benefits to subscribers beyond what they secure from traditional radio. Also bear in mind that NAB has not established, theoretically or empirically, that the cost of SDARS in terms of a reduction in the number of traditional radio stations or loss of local programming will be significant.

In fact, SDARS can offer a significant increase in the number of program formats available to listeners throughout the country. For example, consider Los Angeles. For 62 traditional radio stations located there, we estimate that 30 program formats are provided. We might say that a large market, with a diverse population, reflects listening preferences and choices leading up to this number of formats. The number of formats in Los Angeles corresponds to the number of formats planned by CD Radio alone.

In smaller markets, fewer formats are offered by traditional radio. For comparison, NAB lists for very large Arbitron markets (markets 1-10) an average of 26 different formats, and the averages then fall as follows:

<u>Markets</u>	<u>Average No. of Formats</u>	<u>Percent of U.S. Population</u>
1-10	26.0	33.2
11-25	22.6	18.2
26-50	22.0	15.5
51-100	18.4	15.2
101-261	14.9	18.0

It is reasonable to suppose that there are listeners in these smaller markets, perhaps not a great number in each of them, who would listen to different formats from those they now listen to if they lived in Los Angeles (or in another large market). If so, they would be potential subscribers to SDARS, and would benefit from the service.

There are other benefits of SDARS besides providing the average listener greater format diversity. For example, CD Radio can offer uninterrupted service for car radios for those travelling long distances, and this can provide substantial benefits to listeners who frequently travel. Further, SDARS is of benefit to listeners who prefer programs without commercials, which three of the four proposed services plan. The possibility that subscription fees could permit programs reaching listener groups that cost more than what advertisers alone are willing to pay to reach these groups also is given no consideration. This would reflect a significant benefit to consumers who purchase SDARS and no loss to traditional radio.

JOHN L. PETERMAN

Law & Economics Consulting Group, Inc.
1775 Pennsylvania Ave., N.W.
Suite 1200
Washington, D.C. 20006
Tel. (202) 973-9882
Fax (202) 466-4487

Home Address
6501 Linway Terrace
McLean, Virginia 22101

Tel. (703) 821-0698

EDUCATION

Ph.D., Economics, UNIVERSITY OF VIRGINIA, 1964.

B.A., Economics, DREW UNIVERSITY, 1959.

PRESENT POSITION

LAW & ECONOMICS CONSULTING GROUP, INC., Washington, D.C., April 1994 - present.
Principal

PROFESSIONAL EXPERIENCE

UNIVERSITY OF VIRGINIA, Department of Economics, 1964 - 1966.

Assistant Professor of Economics

Taught graduate and undergraduate industrial organization, microeconomic theory and regulation.

UNIVERSITY OF CHICAGO, LAW SCHOOL, 1966 - 1974.

Fellow, Law and Economics, 1966 - 1967.

Assistant and Associate Professor of Economics, 1967 - 1974.

Law School courses: antitrust economics, regulation.

Graduate School of Business courses: regulation, microeconomic theory, antitrust economics and regulation.

SECURITIES INVESTORS PROTECTION CORPORATION, 1974 - 1975.

Chief Economist

Advised Corporation executives on economic, regulatory and financial issues.

Conducted study of the pricing of SIPC insurance in relation to risk.

FEDERAL TRADE COMMISSION, Bureau of Economics, 1976 - 1993.

Staff Economist, Office of Policy Planning and Evaluation, 1976.

Advised Commission officials on Antitrust and consumer protection issues and conducted research.

Senior Economist, Bureau of Economics, 1976 - 1989.

Economic analysis and advice on antitrust issues including mergers, vertical cases, price discrimination, monopolization, predatory pricing and others. Involved in decisions on case selection.

Deputy Director and at various times, Acting Director, Bureau of Economics, 1980 -1988.

Deputy Director: Responsible for Bureau of Economics review and comment on recommendations for antitrust investigations, grants of compulsory process and complaints. Supervision of staff. Supervised economic work on major antitrust investigations. Advice to the Commission and senior antitrust attorneys on antitrust issues. Attended presentations of outside counsel concerning major or controversial investigations.

Acting Director: Directed all antitrust, consumer protection and research activities of the Bureau of Economics. Directly advised Commission on most major decisions on antitrust issues. Responsible for overall direction of the Bureau.

Director, Bureau of Economics, 1988 - 1993.

Chief economic adviser to the Commission. Directed all antitrust, consumer protection and research activities of the Bureau of Economics. Advised Commission on most major decisions on antitrust and consumer protection actions. Responsible for overall direction of the Bureau. Major participation in development of the 1992 *Merger Guidelines*, including direction of the Commission's economic analysis and participation in high-level meetings with Commission and Department of Justice officials.

SELECTED RESEARCH AND PUBLICATIONS

Study of the Federal Trade Commission's Challenges to Price Discrimination in "The Salt Industry: The Morton and International Salt Cases," forthcoming as FTC Bureau of Economics Report; portions to be published in *Research in Law and Economics*.

ARTICLES

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"The Brown Shoe Case," *Journal of Law and Economics* 11 (April 1975), pp. 81-156.

"Concentration of Control and the Price of Television Time," *American Economic Review*, 61:2 (May 1971), pp. 74-80.

"The Clorox Case and the Television Rate Structure," *Journal of Law and Economics*, 11 (October 1968), pp. 321-422.

"The Structure of National Time Rates in the Television Broadcasting Industry," *Journal of Law and Economics*, 8 (October 1965), pp. 77-132.

April 1995

Analysis of Crystal Radio Award Finalists

Market Rank	Average Population	Population	Average as % of Population	Average # Stations	% of all Stations	# of Finalists	% of Finalists
1-50	2,310,732	115,536,600	67%	42	33%	18	43%
51-100	525,486	26,274,300	15%	29	22%	8	19%
101-150	307,834	15,391,700	9%	20	16%	1	2%
151-200	183,660	9,183,000	5%	19	15%	6	14%
201-261	105,987	6,465,200	3%	15	15%	9	21%
TOTALS	3,433,699	172,850,800	100%		100%	42	100%

Source: Market ranks and populations from the NAB's submission in this matter.

U.S. Radio Stations and Arbitron Data

Market Name/Grouped by Population	Rank	Population	# of Stations	# of Markets	Y	N	# of Stations That Do Not Meet Criterion	Total Stations	# of Stations That Do Not Meet Criterion
> 1,000,000									
New York	1	14,124,200	54		Y				
San Francisco/Oakland	4	5,330,700	55		Y				
Dallas/Ft. Worth	7	3,542,600	52		Y				
Boston	10	3,206,100	60		Y				
Seattle/Tacoma/Everett	13	2,696,500	58		Y				
Minneapolis/St. Paul	16	2,146,200	45		Y				
Pittsburgh	19	2,031,400	48		Y				
Cleveland	22	1,766,100	37		Y				
Cincinnati	25	1,548,800	39		Y				
Riverside/San Bernardino	28	1,347,800	29		Y				
Providence	31	1,278,800	29			N	1		0.41%
San Antonio	34	1,166,500	43			N	2		0.82%
Charlotte	37	1,060,500	40						
				13					
								243	1.23%
700,000-1,000,000									
Buffalo/Niagara Falls	40	995,600	27		Y				
Memphis	43	931,200	37		Y				
Monmouth-Ocean Counties	46	873,800	16		Y				
West Palm Beach	49	829,100	23		Y				
Raleigh/Durham/Chapel Hill	52	804,800	36		Y				
Las Vegas	55	776,400	31						
Honolulu	58	731,500	35			N	3		3.26%
				7					
								92	

Market Name/Grouped by Population	Rank	Population	# of Stations	# of Markets	Y	N	That Do Not Meet Criterion	Total Stations	That Do Not Meet Criterion
400,000-700,000									
Scranton/Wilkes-Barre	61	636,600	40		Y				
Fresno	64	586,800	42		Y				
Akron	67	565,100	13		Y				
Knoxville	70	531,200	43		Y				
Harrisburg	73	516,900	26		Y				
Wilmington	76	506,700	15		Y				
Little Rock	80	447,200	36						
Charleston, SC	82	439,000	30			N	1		0.75%
Mobile	85	414,500	27		Y				
Bakersfield	88	412,500	34		Y				
				10				134	
300,000-400,000									
Spokane	91	391,800	33		Y				
Fort Wayne	94	385,700	26		Y				
Melbourne/Titusville	97	377,100	18		Y				
York	100	370,000	14		Y				
Morristown	103	368,300	8		Y				
Lakeland	106	366,000	14		Y				
Bridgeport	109	360,900	12		Y				
Augusta	112	357,100	30		Y				
Santa Rosa	115	348,800	14		Y				
Canton	118	335,000	14		Y				
Madison	121	326,100	23						
Fayetteville, NC	124	318,300	24		Y				
Shreveport	127	302,300	19		Y				
				13				157	

Market Name/Grouped by Population	Rank	Population	# of Stations	# of Markets	Y	N	That Do Not Meet Criterion	Total Stations	That Do Not Meet Criterion
200,000-300,000									
Davenport/RI/Moline	130	290,500	23		Y				
Trenton	133	282,200	14		Y				
Reno	136	271,100	27		Y				
Huntington, WV	139	267,700	26		Y				
Montgomery	142	256,200	19		Y				
Ann Arbor	145	249,400	10		Y				
Springfield, MO	148	238,800	25		Y				
Erie	151	232,400	21						
Salisbury/Ocean City	154	223,500	31		Y				
Wausau/Stevens Point	157	212,800	25		Y				
Columbus, GA	160	211,400	17		Y				
Killeen/Temple	163	205,800	12		Y				

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150,000-200,000

Fayetteville/Springdale, AZ	166	199,200	22		Y				
Tallahassee	169	191,200	22		Y				
Lubbock	172	186,900	23						
Dothan, AL	175	180,500	21		Y				
Tupelo	178	177,600	17		Y				
Terre Haute	181	170,700	19		Y				
Cape Cod	184	167,000	18		Y				
Yakima	187	162,700	19		Y				
Elmira/Corning	190	161,000	24		Y				
Amarillo	193	158,700	25		Y				
Alexandria	196	151,700	18		Y				

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Market Name/Grouped by Population	Rank	Population	# of Stations	# of Markets	Y	N	That Do Not Meet Criterion	Total Stations	That Do Not Meet Criterion
100,000-150,000									
Champaign/Urbana	199	149,600	20		Y				
Marion/Carbondale	202	136,600	21		Y				
Laurel/Hattiesburg	205	135,700	20		Y				
Tuscaloosa	208	134,000	16		Y				
Tri-Cities (Richland/Kennewick/Pasco)	211	131,100	14		Y				
Dubuque	214	130,200	14		Y				
Parkersburg/Marietta	217	126,300	21		Y				
Burlington/Plattsburgh	220	119,600	23						
Eau Claire	223	117,300	18		Y				
Joplin	226	115,500	27		Y				
Panama City	229	114,200	18		Y				
Bryan/College Station	232	109,000	15		Y				
Wichita Falls	235	105,100	11		Y				
Texarkana	238	100,400	18		Y				
				14				125	
0-100,000									
Lawton	241	97,000	17		Y				
Rochester, MN	244	91,600	15		Y				
Grand Junction	247	86,000	17		Y				
Ithaca	250	83,500	10		Y				
Owensboro	253	73,400	7		Y				
Bangor	256	66,800	19		Y				
Cheyenne	259	62,700	11		Y				
				7				50	
TOTALS			87			7		2192	0.32%

Source for Attachment 2

The audience numbers used in the above tests (and which are separately attached for each market) are from copyrighted materials of the Arbitron Company and James H. Duncan, Jr., American Radio, Spring 1995. All such numbers are copyrighted, all rights reserved by the Arbitron Company and by James H. Duncan, Jr. Their use herein is with permission. The audience numbers used above are the listeners per quarter hour in the metro area for the average broadcast week (Mon-Sun, 6 a.m.-midnight) and are in hundreds.

New York

Audience Data				
New York				
Rank	1			
				90%
	Station	FM/AM	Audience(00's)	Audience(00's)
1	WLTW	F	1316	1184
2	WCBS	F	1203	1083
3	WQHT	F	1165	1049
4	WHTZ	F	1098	988
5	WRKS	F	1082	974
6	WPLJ	F	1057	951
7	WINS	A	1056	950
8	WBLS	F	1001	901
9	WABC	A	975	878
10	WQCD	F	966	869
11	WMXV	F	935	842
12	WXRK	F	919	827
13	WOR	A	901	811
14	WSKQ	F	828	745
15	WCBS	A	827	744
16	WFAN	A	814	733
17	WPAT	F	789	710
18	WQXR	F	624	562
19	WNEW	F	612	551
20	WYNY	F	534	481
21	WAXQ	F	528	475
22	WADO	A	473	426
23	WQEW	A	459	413
24	WLIB	A	299	269
25	WALK	F	288	259
26	WFME	F	237	213
27	WSKQ	A	225	203
28	WDRE	F	211	190
29	WNWK	F	177	159
30	WWRL	A	173	156
31	WBAB	F		
32	WBBR	A		
33	WBLI	F		
34	WBZO	F		
35	WDHA	F		
36	WEVD	A		
37	WHLI	A		
38	WHUD	F		
39	WKDM	A		
40	WKJY	F		
41	WPAT	A		
42	WWRV	A		

New York

43	WKXW	F			
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San Francisco

Audience Data				
San Francisco/Oakland				
Rank	4			
				90%
	Station	FM/AM	Audience(00's)	Audience(00's)
1	KGO	A	681	613
2	KNBR	A	467	420
3	KCBS	A	438	394
4	KMEL	F	368	331
5	KYLD	FF	357	321
6	KOIT	AF	348	313
7	KIOI	F	306	275
8	KBLX	F	277	249
9	KABL	A	266	239
10	KKSF	F	251	226
11	KITS	F	229	206
12	KRFC	F	218	196
13	KPIX	AF	213	192
14	KSAN	F	212	191
15	KRQR	F	205	185
16	KBAY	F	198	178
17	KSJO	F	194	175
18	KFOG	F	189	170
19	KDFC	AF	174	157
20	KLOK	A	143	129
21	KABL	F	138	124
22	KFRC	A	123	111
23	KOFY	A	112	101
24	KHQT	F	104	94
25	KOME	F	101	91
26	KSOL	F	98	88
27	KYCY	F	95	86
28	KJAZ	F	92	83
29	KRTY	F	89	80
30	KSFO	A	85	77
31	KARA	F		
32	KBRG	F		
33	KDIA	A		
34	KEZR	F		
35	KFAX	A		
36	KIQI	A		
37	KKIQ	F		
38	KNEW	A		
39	KRPQ	F		
40	KUFX	F		
41	KUIC	F		
42	KXFX	F		

San Francisco

43	KZST	F			
44	KATM	F			
45	KHOP	F			
46	KSEF	F			

Dallas

Audience Data				
Dallas/Ft. Worth				
Rank	7			
				90%
	Station	FM / AM	Audience(00's)	Audience(00's)
1	KSCS	F	377	339
2	KHKS	F	353	318
3	KBAP	A	343	309
4	KVIL	AF	316	284
5	KPLX	F	299	269
6	KOAI	F	298	268
7	KYNG	F	297	267
8	KKDA	F	247	222
9	KLUV	F	225	203
10	KDGE	F	214	193
11	KRLD	A	200	180
12	KJMZ	F	200	180
13	KEGL	F	185	167
14	KRRW	F	184	166
15	KDMX	F	179	161
16	KTXQ	F	174	157
17	KLTY	F	172	155
18	KZPS	F	171	154
19	KSNM	F	131	118
20	WRR	F	109	98
21	KLIF	A	105	95
22	KESS	A	104	94
23	KKDA	A	84	76
24	KHVN	A	84	76
25	KTCK	A	71	64
26	KDZR	F	70	63
27	KGBS	A		
28	KICI	F		
29	KMRT	A		
30	KRVA	A		

Boston

Audience Data				
Boston				
Rank	10			
				90%
	Station	FM/AM	Audience(00's)	Audience(00's)
1	WBZ	A	456	410
2	WKXS	F	370	333
3	WRKO	A	329	296
4	WJMN	F	329	296
5	WMJX	F	301	271
6	WBCN	F	286	257
7	WBMX	F	269	242
8	WODS	F	264	238
9	WZLX	F	245	221
10	WHDH	A	233	210
11	WBOS	F	218	196
12	WSSH	F	201	181
13	WCRB	F	174	157
14	WEEI	A	162	146
15	WCLB	F	145	131
16	WAAF	F	144	130
17	WFNX	F	131	118
18	WXKS	A	104	94
19	WBCS	F	88	79
20	WILD	A	78	70
21	WCGY	F	63	57
22	WPLM	F	42	38
23	WBOQ	F		
24	WESX	A		
25	WJDA	A		
26	WJIB	A		
27	WLYT	F		
28	WRCA	A		
29	WROL	A		
30	WXLO	F		
31	WBRU	F		
32	WCTK	F		
33	WHJY	F		

Seattle

Audience Data					
Seattle/Tacoma/Everett					
Rank	13				
				90%	
	Station	FM/AM	Audience(00's)	Audience(00's)	
1	KMPS	AF	377	339	
2	KBSG	AF	289	260	
3	KVI	A	279	251	
4	KIRO	A	265	239	
5	KUBE	F	239	215	
6	KPRM	F	208	187	
7	KISW	F	205	185	
8	KING	F	185	167	
9	KNDD	F	179	161	
10	KPLZ	F	178	160	
11	KIXI	A	171	154	
12	KOMO	A	167	150	
13	KLSY	F	153	138	
14	KZOK	F	150	135	
15	KJR	F	134	121	
16	KMTT	F	125	113	
17	KRWM	F	120	108	
18	KXXR	F	119	107	
19	KEZX	F	98	88	
20	KJR	A	95	86	
21	KCMS	F	60	54	
22	KING	A	51	46	
23	KIRO	F	38	34	
24	KCIS	A			
25	KGNW	A			
26	KRIZ	A			
27	KXXO	F			
28	KMNT	F			

Minneapolis

Audience Data				
Minneapolis/St. Paul				
Rank	16			
				90%
	Station	FM / AM	Audience(00's)	Audience(00's)
1	WCCO	A	485	437
2	KQRS	AF	396	356
3	KSTP	F	290	261
4	KDWB	F	256	230
5	WLTE	F	239	215
6	KEEY	F	208	187
7	KEGE	F	198	178
8	KQQL	F	195	176
9	KSTP	A	191	172
10	WBOB	F	154	139
11	KTCZ	AF	153	138
12	KJJO	AF	132	119
13	KLBB	A	73	66
14	KFAN	A	58	52
15	KCFE			
16	KREV			
17	WIMN			
18	WWTC			

Pittsburgh

Audience Data				
Pittsburgh				
Rank	19			
			90%	
	Station	FM/AM	Audience(00's)	Audience(00's)
1	KDKA	A	551	496
2	WDVE	F	383	345
3	WBZZ	F	243	219
4	WWSW	AF	236	212
5	WDSY	F	204	184
6	WSHH	F	176	158
7	WVTY	F	163	147
8	WAMO	F	158	142
9	WLTJ	F	134	121
10	WJAS	A	131	118
11	WRRK	F	126	113
12	WTAE	A	119	107
13	WXRB	F	99	89
14	WQKB	F	65	59
15	WWKS	F	61	55
16	KQV	A	47	42
17	WORD	F	40	36
18	WASP	A		
19	WASP	F		
20	WBVP	A		
21	WCVI	A		
22	WEED	A		
23	WELA	F		
24	WESA	F		
25	WHJB	A		
26	WJPA	AF		
27	WMBA	A		
28	WMBS	A		

Cleveland

Audience Data				
Cleveland				
Rank	22			
				90%
	Station	FM/AM	Audience(00's)	Audience(00's)
1	WGAR	F	284	256
2	WMJI	F	255	230
3	WDOK	F	238	214
4	WRMR	A	221	199
5	WZAK	F	214	193
6	WMMS	F	213	192
7	WLTF	F	192	173
8	WNCX	F	189	170
9	WQAL	F	164	148
10	WWWE	A	139	125
11	WZJM	F	133	120
12	WKNR	A	127	114
13	WNWV	F	91	82
14	WENZ	F	74	67
15	WJMO	A	67	60
16	WCLV	F	52	47
17	WABQ	A	35	32
18	WEOL	A		
19	WERE	A		
20	WHK	A		
21	WZLE	F		
22	WKDD	F		
23	WKKY	F		
24	WONE	F		
25	WQMX	F		

Cincinnati

Audience Data				
Cincinnati				
Rank	25			
			90%	
	Station	FM/AM	Audience(00's)	Audience(00's)
1	WLW	A	327	294
2	WEBN	F	218	196
3	WUBE	AF	200	180
4	WKRQ	F	187	168
5	WGRR	F	174	157
6	WIZF	F	136	122
7	WCKY	A	132	119
8	WPPT	F	118	106
9	WSAI	A	111	100
10	WRRM	F	106	95
11	WYGY	F	93	84
12	WOFX	F	92	83
13	WWNK	F	84	76
14	WAQZ	F	37	33
15	WAKW	F	35	32
16	WAOZ	A		
17	WBND	A		
18	WCIN	A		
19	WCVG	A		
20	WIOK	F		
21	WMOH	A		
22	WNKR	F		
23	WNLT	F		

Riverside

Audience Data				
Riverside/San Bernardino				
Rank	28			
				90%
	Station	FM/ AM	Audience(00's)	Audience(00's)
1	KFRG	F	165	149
2	KFI	A	159	143
3	KGGI	F	143	129
4	KOLA	F	97	87
5	KIIS	F	88	79
6	KROQ	F	85	77
7	KCBS	F	85	77
8	KLOS	F	79	71
9	KHTX	F	74	67
10	KOST	F	73	66
11	KCAL	F	72	65
12	KBIG	F	60	54
13	KWRP	F	58	52
14	KRTH	F	56	50
15	KCAL	A	51	46
16	KDIF	A	44	40
17	KAEV	F		
18	KATY	F		
19	KCKC	A		
20	KOOJ	F		
21	KWRM	A		
22	KXRS	F		
23	KNSE	A		
24	KWVE	F		

Providence

Audience Data				
Providence				
Rank	31			
			90%	
	Station	FM/AM	Audience(00's)	Audience(00's)
1	WHJY	F	210	189
2	WWLI	F	201	181
3	WPRO	F	176	158
4	WSNE	F	126	113
5	WCTK	F	122	110
6	WWBB	F	114	103
7	WWKX	F	112	101
8	WWRX	F	112	101
9	WLKW	A	105	95
10	WHJJ	A	103	93
11	WPRO	A	103	93
12	WBRU	F	83	75
13	WOTB	F	29	26
14	WALE	A		
15	WARV	A		
16	WBSM	A		
17	WFHN	F		
18	WHIM	A		
19	WHTB	A		
20	WSAR	A		
21	WNBH	A		
22	WNRI	A		
23	WCIB	F		
24	WFAN	A	New York	
25	WQRC	F		